

## REMARKS

Applicants thank the Examiner for the indication that claims 7-8, 14, and 26-27 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims as well as including all corrections of claim objections stated above.

Claims 1-3, 5-6, 8-12, 15, 21-23, 25, and 27-28 are pending in the application. Claims 1, 11, and 21 are independent. Claims 1, 5-6, 8, 11, 15, 21, 25 and 27 have been amended. Claims 4, 7, 13-14, 16-20, 24, and 26 have been canceled. These changes are believed to introduce no new matter and their entry is respectfully requested.

### Objection to claims 1, 6, 11, 16, and 21

In paragraph 3 of the Office Action, the Examiner objected to claims 1, 6, 11, 16, and 21 stating that the term “type” renders claims 1, 11, 16, and 21 indefinite, that the wording “unit to” in claim 1 should be “unit is to,” and that claim 6 has an improper dependency. Claims 1, 6, 11, and 21 have been amended to accommodate the Examiner’s objection. Claim 16 has been canceled rendering the objection to it moot. Accordingly, Applicants respectfully request that the examiner reconsider and remove the objections to claims 1, 6, 11, 16, and 21.

### Rejection of Claims 1, 3-5, 9-11, 13, 15, 21, 23-25, and 28 Under 35 U.S.C. §102(b)

In paragraph 2, the Examiner rejected claims 1, 3-5, 9-11, 13, 15, 21, 23-25, and 28 under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,731,711 to Gabara (hereinafter “Gabara”). A claim is anticipated only if each and every element of the claim is found in a reference. (M.P.E.P. § 2131 *citing Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628 (Fed. Cir. 1987)). The identical invention must be shown in as complete detail as is contained in the claim. *Id. citing Richardson v. Suzuki Motor Co.*, 868 F.2d 1226,1236 (Fed. Cir. 1989)). Applicants respectfully traverse the rejection.

In paragraph 6, the Examiner indicated that claims 7-8, 14, and 26-27 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims as well as including all corrections of claim objections stated above.

Claim 1 has been rewritten to include all the limitations of claims 4 and 7. Claim 1 also has been amended to accommodate the Examiners objections. Claim 1 should now be in condition for allowance. Claims 3, 5, and 9-10 properly depend from claim 1 and therefore should be in condition for allowance as well. Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection of claims 1, 3, 5, and 9-10.

Claim 11 has been rewritten to include all the limitations of claims 13 and 14. Claim 11 also has been amended to accommodate the Examiners objections. Claim 11 should now be in condition for allowance. Claims 12 and 15 properly depend from claim 11 and therefore should be in condition for allowance as well. Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection of claims 11-12 and 15.

Claim 21 has been rewritten to include all the limitations of claims 24 and 26. Claim 21 also has been amended to accommodate the Examiners objections. Claim 21 should now be in condition for allowance. Claims 23, 25, and 27-28 properly depend from claim 21 and therefore should be in condition for allowance as well. Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection of claims 21, 23, 25, and 27-28.

#### Rejection of Claims 2, 12, and 22 Under 35 U.S.C. § 103(a)

In paragraph 3 of the Office Action, the Examiner rejected claims 2, 12, and 22 under 35 U.S.C. § 103(a) as being obvious over Gabara. To establish a *prima facie* case of obviousness, an Examiner must show three things: (1) that there is some suggestion or motivation to modify a reference or combine reference teachings to arrive at the claimed invention, (2) that there must be a reasonable expectation of success, and (3) that the

references teach or suggest each and every element of the claimed invention. (MPEP §2143.) Applicants respectfully traverse the rejection.

Claims 2, 12, and 22 properly depend from claims 1, 11, and 21, respectively, and therefore should be in condition for allowance. Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection of claims 2, 12, and 22.

Rejection of Claim 6 Under 35 U.S.C. § 103(a)

In paragraph 4 of the Office Action, the Examiner rejected claim 6 under 35 U.S.C. § 103(a) as being obvious over Gabara. Applicants respectfully traverse the rejection.

Claim 6 properly depends from claim 1 and therefore should be in condition for allowance. Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection of claim 6.

Rejection of Claims 16-20 Under 35 U.S.C. § 103(a)

In paragraph 6 of the Office Action, the Examiner rejected claims 16-20 under 35 U.S.C. § 103(a) for the same reasons that claims 1-6 have been rejected. Applicants respectfully traverse the rejection.

Applicants have canceled claims 16-20 rendering the rejection of them moot. Accordingly, Applicants respectfully request that the Examiner reconsider and remove the rejection of claims 16-20.

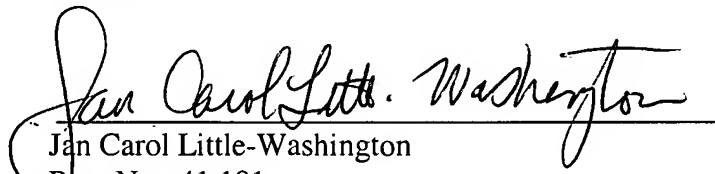
## CONCLUSION

Applicants submit that all grounds for objection and rejection have been properly accommodated traversed, or rendered moot, and that the application is in condition for allowance. The Examiner is invited to telephone the undersigned representative if the Examiner believes that an interview might be useful for any reason.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN

Date: 11/14/2003

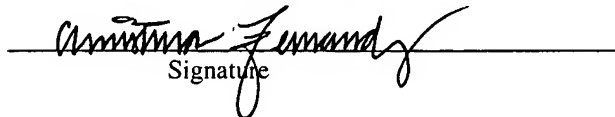
  
Jan Carol Little-Washington  
Reg. No.: 41,181

### FIRST CLASS CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as first class mail with sufficient postage in an envelope addressed to Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450

on November 14, 2003  
Date of Deposit

Christina Fernandez  
Name of Person Mailing Correspondence

  
Signature

November 14, 2003  
Date